

EXHIBIT A

Steve W. Berman (*pro hac vice*)
Mark S. Carlson (*pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Ave., Ste. 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
markc@hbsslaw.com

Philip Graves (CBA No. 153441)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
Telephone: (213) 330-7150
Facsimile: (213) 330-7152
philipg@hbsslaw.com

Rio S. Pierce (CBA No. 298297)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
riop@hbsslaw.com

Attorneys for Plaintiff
Rearden LLC and Rearden Mova LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REARDEN LLC, REARDEN MOVA LLC,
California limited liability companies,

Plaintiffs,

v.

THE WALT DISNEY COMPANY, a Delaware
corporation, WALT DISNEY MOTION
PICTURES GROUP, INC., a California
corporation, BUENA VISTA HOME
ENTERTAINMENT, INC. a California
corporation, MARVEL STUDIOS, LLC, a
Delaware limited liability company,
MANDEVILLE FILMS, INC., a California
corporation,

Defendants.

No. 3:17-CV-04006-JST

**PLAINTIFFS' SECOND
INTERROGATORIES TO
DEFENDANT THE WALT DISNEY
COMPANY**

Pursuant to ecf No. 166 and Rule 33 of the Federal Rules of Civil Procedure, plaintiffs Rearden LLC and Rearden Mova LLC hereby serve the following interrogatories on defendant The Walt Disney Company.

INSTRUCTIONS

A. These Interrogatories seek complete and full responses as of the date the responses are executed, and which reflect or embody all relevant information or documentation known to YOU and/or within YOUR custody and/or control as of that date. Should YOU later learn that any response was incomplete, incorrect when made, or though correct when made is no longer accurate, the response shall be timely supplemented as required by Rule 26 of the Federal Rules of Civil Procedure.

B. In responding to the following Interrogatories, furnish all information available, including information in the possession, custody or control of DISNEY and its representatives, not merely information within the personal knowledge of the person responding to the Interrogatories.

C. All responses and objections shall be made in writing and delivered to the offices of Hagens Berman Sobol Shapiro LLP, 1301 Second Ave., Ste. 2000, Seattle, Washington, 98101.

DEFINITIONS

A. ENTITY shall mean any organization, firm, corporation, partnership, sole proprietorship, or other legal entity that is not a natural person. The acts “of an ENTITY” include the acts of owners, directors, officers, members, employees, agents, attorneys, representatives, contractors, and any other person acting on the ENTITY’s behalf.

B. When referring to an ENTITY, “to IDENTIFY” means to give the ENTITY’s full legal name, type of entity (e.g., corporation, LLC, etc.), nation and state or province under which the ENTITY is organized or principally registered, any fictitious names or dbas under which the ENTITY is doing business, present or last known address of the ENTITY’s headquarters, and the ENTITY’s primary telephone number. With respect to a person, “to IDENTIFY” means to give the person’s full name, employer, job title, and last known address and telephone number. With respect

to a contract, “to IDENTIFY” means to state the parties to the contract, its signatories, and the date of the contract.

C. DISNEY, YOU, or YOUR as used herein means The Walt Disney Company and all past or present divisions, and parents, subsidiaries, or affiliates of The Walt Disney Company, all past or present joint ventures, partnerships, and limited partnerships of which any of the foregoing entities is a joint venture or a limited or general partner, including but not limited to Walt Disney Pictures Productions, Marvel Studios, Cogsworth Productions, Chip Pictures, Assembled Productions II, and Infinity Productions, and all past or present owners, directors, officers, members, employees, agents, attorneys, representatives, contractors, and any other persons under the control of any of the foregoing entities.

D. ACCUSED FILMS as used herein means *Guardians of the Galaxy* (2014), *Avengers: Age of Ultron* (2015), and *Beauty and the Beast* (2017).

E. DISNEY DEPOSITION as used herein means the June 19, 2019 Deposition of The Walt Disney Company pursuant to Fed. R. Civ. P. 30(b)(6).

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the ENTITY within the DISNEY organization that controls the “Disney data center” referred to at 102:1-103:18 of the DISNEY DEPOSITION, and identify the data center’s custodian.

RESPONSE:

INTERROGATORY NO. 2:

Identify all employees and/or independent contractors of DISNEY who worked on visual effects for the Beast character in *Beauty and the Beast*, including persons who approved the appearance of the Beast character including but not limited to Alan Horn and Sean Bailey.

RESPONSE:

INTERROGATORY NO. 3:

1 Identify all employees and/or independent contractors who worked for DISNEY on visual
2 effects for the Thanos character in *Guardians of the Galaxy*, including but not limited to persons who
3 approved the appearance of the Thanos character.

4 **RESPONSE:**

5
6 **INTERROGATORY NO. 4:**

7 Identify all employees and/or independent contractors who worked for DISNEY on visual
8 effects for the Thanos character in *Avengers: Age of Ultron*, including but not limited to persons who
9 approved the appearance of the Thanos character.

10 **RESPONSE:**

11
12 **INTERROGATORY NO. 5:**

13 Identify separately the custodian(s) of the contracts identified at each of the following
14 citations to the Deposition of The Walt Disney Company pursuant to Fed. R. Civ. P. 30(b)(6):

- 15 (a) the contracts stated in 22:19-23:10
16 (b) the contract stated in 28:20-30:8
17 (c) the contract stated in 33:6-34:13
18 (d) the contract stated in 34:15-35:11
19 (e) the contract stated in 35:13-36:15
20 (f) the license agreement stated in 47:11-47:23
21 (g) the contract stated in 62:2-12
22 (h) the contract stated in 64:2-64:13
23 (i) the contracts identified in Exhibit 6 to the DISNEY DEPOSITION
24 (j) the contract with Bill Condon for directing *Beauty and the Beast*
25 (k) the contract with Mandeville Films and/or DHTL Productions
26 (l) each license granted to or by Cogsworth Productions and/or Chip Pictures related to the
27 production, promotion, or distribution of *Beauty and the Beast*.
28

RESPONSE:

DATED: July 31, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve Berman
Steve Berman

Steve W. Berman (*pro hac vice*)
Mark S. Carlson (*pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
markc@hbsslaw.com

Philip Graves (CBA No. 153441)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
Telephone: (213) 330-7150
Facsimile: (213) 330-7152
philipg@hbsslaw.com

Rio S. Pierce (CBA No. 298297)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
riop@hbsslaw.com

Attorneys for Plaintiffs
Rearden LLC and Rearden Mova LLC